

Exhibit A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

-against-

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

-----X
In re:

BERNARD L. MADOFF,

Debtor.
-----X

**[PROPOSED] ORDER GRANTING MOTION OF KHRONOS LLC
TO QUASH THE TRUSTEE’S FED. R. BANKR. P. 2004 SUBPOENA**

Upon consideration of the motion (the “Motion”) filed by Khronos LLC for an order quashing the subpoena (the “Rule 2004 Subpoena”) issued by Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the substantively consolidated estate of Bernard L. Madoff, and due and proper notice of the Motion having been given and it appearing that no other or further notice need be provided; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the Order Granting Authority to Issue Subpoenas for the Production of Documents and the Examination of Witnesses, dated January 12, 2009; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court

having found and determined that the relief sought in the Motion as set forth herein is warranted;
and after due deliberation and sufficient cause appearing therefore, it is:

ORDERED that the Motion is granted to the extent provided herein; and it is further

ORDERED that the Rule 2004 Subpoena is hereby quashed in its entirety; and it is
further

ORDERED that the Court shall retain jurisdiction to hear and determine all matters
arising from or related to the implementation of this Order.

Dated: New York, New York
_____, 2020

HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE